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UBER TECHNOLOGIES, INC.
13 and OTTOMOTTO LLC

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

17 WAYMO LLC,
18 Plaintiff,
19 v.
20 UBER TECHNOLOGIES, INC.,
21 OTTOMOTTO LLC; OTTO TRUCKING LLC,
22 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MAXWELL V.
PRITT IN SUPPORT OF
DEFENDANTS UBER
TECHNOLOGIES, INC.'S AND
OTTOMOTTO, LLC'S MOTION TO
COMPEL RESPONSES TO
DOCUMENT REQUESTS AND
INTERROGATORIES, ENFORCE
THE COURT ORDER'S ON SEACH
TERMS, AND COMPEL 30(B)(6)
TESTIMONY**

Judge: Hon. Jacqueline Scott Corley
Trial Date: October 10, 2017

1 I, Maxwell Pritt, declare as follows:

2 1. I am counsel at the law firm of Boies Schiller Flexner LLP representing
3 Defendants Uber Technologies Inc. and Ottomotto LLC (collectively, “Uber”) in this matter. I
4 am a member in good standing of the Bar of the State of California. I make this declaration in
5 support of Uber’s motion to compel Waymo to answer or supplement its responses to Uber’s
6 Interrogatory Nos. 18-20 and 24-25, to produce documents sought by Uber’s Request for
7 Production of Documents Nos. 166 and 170-175, to designate a 30(b)(6) witness to testify on
8 Uber’s Topic 7 regarding Waymo’s use of indemnification provisions, and to enforce the Court’s
9 August 7 order that Waymo run bonus search terms on the 11 custodians identified by Uber and
10 its 30(b)(6) witnesses on Uber’s 30(b)(6) bonus topic. I make this declaration based on personal
11 knowledge and if called as a witness, I could and would competently testify to the matters set
12 forth herein.

13 2. Attached as **Exhibit 1** is a true and correct copy of Plaintiff Waymo LLC’s
14 (“Waymo’s”) Objections and Responses to Uber’s Fifth Set of Interrogatories (Nos. 18-24).

15 3. Attached as **Exhibit 2** is a true and correct copy of Waymo’s Objections and
16 Responses to Uber’s Sixth Set of Interrogatories (Nos. 25-27).

17 4. Attached as **Exhibit 3** is a true and correct copy of Waymo’s Responses and
18 Objections to Uber’s Fourth Set of Requests for Productions (No 164-166).

19 5. Attached as **Exhibit 4** is a true and correct copy of Waymo’s Responses and
20 Objections to Uber’s Fifth Set of Requests for Productions (No 167-175).

21 6. Attached as **Exhibit 5** is true and correct copy of excerpts of the certified
22 deposition transcript of Jai Krishan, dated August 9, 2017.

23 7. Attached as **Exhibit 6** is a true and correct copy of emails between me, Special
24 Master John Cooper, Waymo counsel Andrea Roberts, and others dated between July 8 and July
25 30, 2017.

26 8. Attached as **Exhibit 7** is a true and correct copy of emails between me, Special
27 Master Cooper, Waymo counsel Jeff Nardinelli, and others dated between August 6 and August
28 8, 2017.

9. Attached as **Exhibit 8** is true and correct copy of emails between me and Andrea Roberts Pritt dated between August 7 and August 9, 2017.

10. Attached as **Exhibit 9** is a true and correct copy of an email Waymo counsel Andrea Roberts to Special Master Cooper and counsel for Defendants, and others, dated August 11, 2017.

11. Attached as **Exhibit 10** is a true and correct copy of emails between me, Waymo counsel Andrea Roberts, Special Master Cooper, and others dated between August 10 and August 12, 2017.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 15th day of August, 2017, in Oakland, California.

/s/ Maxwell V. Pritt

Maxwell V. Pritt

ATTESTATION OF E-FILED SIGNATURE

I, Karen L. Dunn, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Maxwell V. Pritt has concurred in this filing.

/s/ Karen L. Dunn

Karen L. Dunn